STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
Cleon B. Feight, Division Director

4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

January 14, 1983

Mr. Ernest E. Burgh
General Manager, Operations
Utah Marblehead Lime Company
P. O. Box 488
Chicago Heights, Illinois 60411

Attention: Mr. Philip N. Raines

RE: Permitting
Utah Marblehead Lime Company
ACT/045/003
Tooele County, Utah

Dear Mr. Burgh:

The Division of Oil, Gas and Mining staff has reviewed Utah Marblehead Lime's submittal dated November 30, 1982 for compliance with the appropriate regulations.

The Division's October 5, 1982 letter requesting further information appeared to be misunderstood and inadequately answered in several instances. Therefore, additional information and clarification are requested in the enclosed comments. Since it appears that most of the inadequacies were due to a lack of communication or misunderstanding, it is highly recommended at this point that any further answers be discussed with the appropriate Division personnel over the phone or in a face-to-face meeting. In this way, remaining inadequacies can be clarified quickly. With prompt action, the mining and reclamation plan could be presented to the Board of Oil, Gas and Mining for possible tentative approval at its February meeting.

Please contact me or Susan Linner of my staff if you have any questions.

Sincerely,

JAMES W. SMITH, JR.
COORDINATOR OF MINED
LAND DEVELOPMENT

JWS/SCL:btb
Enclosures
cc: Grant Reed, Utah Marblehead Lime, Grantsville
Tom Portle, DOGM
Cy Young, DOGM
Pam Grubaugh-Littig, DOGM

REVIEW

Marblehead Lime Company
ACT/045/003, Tooele County, Utah

Rule M-3(1)(d)

The detailed plant site map should include the crusher and screening facilities and conveyors located east of the burner building. The map should also include the location and approximate size of the dolomite storage pile.

Rule M-3(2)(c)(1)
M-10(1), (12), (14)

Since the disturbed area associated with this operation has generally occurred without the benefit of topsoil removal and protection, alternate revegetation methods are necessary. Options which are available include the use of in-situ "fill" materials and the use of substitute materials. The Division has addressed these options in its October 5, 1982 review letter and received little in the way of a substantial response.

With regard to the use of substitute material, the operator indicates that "no toxicity" will result from the use of screening pile material. Further, that this material will be "spread over the existing plant site" and "revegetation will be tried directly on top of this material." The underlying concern which brought up the toxicity question is centered on the strong possiblity that excess salts and/or improper ionic balance, as well as low fertility conditions, may exist and have an adverse effect on revegetation efforts.

With regard to the use of in-situ material, it must be established that this approach will be effective. In order to accomplish this, it is necessary that testing of these materials be performed in the manner described on page two of the October 5, 1982 review letter with the addition of cation exchange capacity (CEC). Also, as requested in the aforementioned letter, cultural treatments required to establish vegetation pursuant to this option must be delineated. This will probably necessitate the development of test plots. Knowledge of the method of treatment of this material will prove critical to the ultimate success of reclamation and attendant bond retrieval.

It is hardly possible to extract any useful information from the November 30, 1982 response to these concerns. It would be beneficial to both Utah Marblehead and the Division of Oil, Gas and Mining (DOGM) to begin a meaningful dialogue on these points. No approval is possible without a viable reclamation plan. Possibly a phone conversation or a meeting would prove more fruitful than further exchange of correspondence in the absence of complete understanding of what constitutes a soils management plan and how it is tied into a reclamation plan capable of affecting bond retrieval.

Rule M-3(2)(e)
M-10(12)

It has still not been stated what method was used to determine that the native vegetative community in the area has a ground cover of 30 percent, and who did the work.

It is stated that seeding in the plant site will be done at a rate of 7.5 pounds Pure Live Seed (PLS) per acre. This is a low rate to use with the method of broadcast seeding. It is suggested that any broadcast seeding be done at 12-15 pounds PLS per acre. Why is there a different seed mix for the quarry area? A seed mix cannot solely be composed of annual or biennial species; please resubmit a list for the quarry area that contains perennial species. Again, seeding rate should be 12-15 pounds PLS per acre. A specific seed mix and fertilization plan for each area must be submitted to DOGM for approval, at least 90 days prior to any revetetation work occurring.

Rule M-3(2)(f)

There was a misinterpretation of the question about the detailed timetable for the accomplishment of each major step in the reclamation plan, after the operation is shut down. This timetable refers to the extent of time for reclamation, not to the date when reclamation begins. Please submit the appropriate timetable.

Rule M-10(2)

An incorrect assumption was made regarding salvage value of the scrap metal. The bond estimate is formulated from the viewpoint of the cost to the State if the operator abandoned the project. Therefore, the equipment cost would be contractor cost, etc.

A revised bond estimate was calculated reflecting the revised lump sum, contractor hourly rates for equipment and monitoring costs (attached).

DIVISION OF OIL, GAS, AND MINING

BOND ESTIMATE

OPERATOR: Marblehead Lime Company
MINE NAME: Utah Marblehead Lime
LOCATION: Lakeside Mountains
COUNTY: Tooele
DATE: December 6, 1982

	Operation	Amount	Rate	Cost
A.	CLEAN-UP	17 Structures & foundations removed:		
	1. Removal of structures & equipment.	Cran-160 hrs	$107/hr	$ 17,120
		Loader-160 hrs	$96/hr	15,360
	2. Removal of trash & debris.	Dump truck-160 hrs	$35/hr	5,600
	3. Leveling of ancillary facilities pads and access roads.	Trash - 120 hrs 950 loader	$96/hr	17,120
B.	REGRADING & RECONTOURING			
	1. Earthwork including haulage and grading of spoils, waste and overburden.	160 hrs (D-7)	$132.50/hr	21,200
	2. Recontouring of highwalls and excavations.	160 hrs (D-7)	$132.50/hr	21,200
	3. Spreading of soil or surficial materials.			
C.	STABILIZATION			
	1. Soil preparation, scarification, fertilization, etc.			
	2. Seeding or planting.	Seed @ 15#/ac	$75/ac	11,925
		Fertilizer		15,529
	3. Construction of terraces, waterbars, etc.	Tractor Labor		
D.	LABOR			
	1. Supervision.	Operator time-920 hrs	$15/hr	13,800
	2. Labor exclusive of bulldozer time.	2 laborers (helpers) 1,840 hrs	$12/hr	22,080
E.	SAFETY			
	1. Erection of fences, portal coverings, etc.			
	2. Removal or neutralization of explosive or hazardous materials.			
F.	MONITORING			
	1. Continuing or periodic monitoring, sampling & testing deemed necessary.	$1,000/yr for three years		$ 3,000
			$180,327	
G.	OTHER	Contingency @10%		
	1983 - $198,360			
	1984 - $218,196			
	1985 - $240,016		1982	$163,934